

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 2006)

Docket No. R2006-1

OFFICE OF THE CONSUMER ADVOCATE FOLLOW-UP
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-97-99)
(August 3, 2006)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T32-1-7, dated June 2, 2006, are hereby incorporated by reference.

Respectfully submitted,

Shelley S. Dreifuss
Director
Office of the Consumer Advocate

Kenneth E. Richardson
Attorney

901 New York Avenue, NW Suite 200
Washington, D.C. 20268-0001
(202) 789-6830; Fax (202) 789-6891
e-mail: richardsonke@prc.gov

OCA/USPS-97. This interrogatory seeks information on the service standards and achieved service performance for Express Mail. Please refer to your response to OCA/USPS-62.

- a. Refer to your response to part a. Please confirm that the Postal Service collects Product Tracking System (herein “PTS”) data on achieved service performance separately for Custom Designed (Rate Schedule (herein “RS”) 122) Express Mail service. If you do not confirm, please explain.
- b. Refer to your response to part a. In what ways (if any) does the Postal Service measure achieved service performance for Custom Designed (RS 122) Express Mail service. Please explain, and provide any achieved service performance data for Custom Designed (RS 122) Express Mail service.
- c. Refer to your response to part d., which includes the phrase “NPA time-measurement period.” Please define and explain.

OCA/USPS-98. This interrogatory seeks information on the service standards and achieved service performance for First-Class Mail. Please refer to your response to OCA/USPS-63.

- a. Refer to your response to part a., which asked the Postal Service to “confirm that the External First-Class (herein “EXFC”) system does not provide achieved service performance data for First-Class Mail as a whole, or the following First-Class Mail subclasses, as a whole: Letters and Sealed Parcels (Rate Schedule (herein “RS”) 221), or Cards (RS 222).” Does the response, “Not Confirmed,” mean that the EXFC system provides achieved service

- performance data for First-Class Mail as a whole, and the specified subclasses? Please explain the basis for the response “Not confirmed.”
- b. Refer to your response to parts b. and c., which asked the Postal Service to confirm that it measures achieved service performance using measuring systems other than the EXFC system for First-Class Mail as a whole, the First-Class Mail subclasses Letters and Sealed Parcels (RS 221), and Cards (RS 222), and one or more rate categories, or one or more subsets of mail.
- i) Please explain why the Postal Service did not confirm part b. inasmuch as the response also states that the Postal Service “does not measure achieved service performance using measuring systems other than the EXFC system for First-Class Mail” and the stated subclasses.
- ii) Does the Postal Service use ODIS data in measuring achieved service performance for First-Class Mail as a whole, the specified subclasses, one or more rate categories, or one or more subsets of mail? Please explain.
- c. Refer to your response to part d., which asked the Postal Service to “confirm that the EXFC system measures achieved service performance for a subset of mail or type of First-Class Mail service, namely, seeded letter-shaped mailpieces entered at collection boxes as single-piece First-Class Mail in the Letters and Sealed Parcels subclass.” Please explain the “Not confirmed” response inasmuch as the response appears to confirm the interrogatory. Does the response, “Not Confirmed,” mean that the EXFC system provides achieved service performance data for mailpieces other than letter-shaped

mailpieces entered at collection boxes as single-piece First-Class Mail in the specified subclasses?

- d. Refer to your response to part f. Please provide any documentation or analysis to support the basis for the claim that the “Postal Service *believes* that EXFC is statistically representative for what it measures” (Emphasis added)
- e. Refer to your response to part f. Please confirm that the 463 ZIP Code areas selected on the basis of geographic and volume density constitutes the “sample frame.” If not, please confirm and provide the sample frame for the EXFC system.
- f. Refer to your response to part f. Please provide the “sample selection” rules for the 463 ZIP Code areas selected on the basis of geographic and volume density.
- g. Refer to your response to part g. Please provide any documentation or analysis to support the basis for the claim that the “Postal Service *believes* that PTS is statistically representative for what it measures” (Emphasis added)
- h. Refer to your response to part g. Please provide the “sample frame” for PTS with respect to Priority Mail.
- i. Refer to your response to part g. Please provide the “sample selection” rules for PTS with respect to Priority Mail.

OCA/USPS-99. This interrogatory seeks information on the service standards and achieved service performance for Package Services. Please refer to your response to

OCA/USPS-6. Refer to your response to part f. Please explain why the Postal Service does not use PTS data as a measurement of compliance with the service standards cited in Attachment G of the Request, Compliance Statement, response to Rule 54(n) for Parcel Post, Bound Printed Matter, Media Mail and Library Mail sold at retail with Delivery Confirmation.